

**IN THE CIRCUIT COURT OF DAVIDSON COUNTY TENNESSEE
TWENTIETH JUDICIAL DISTRICT AT NASHVILLE**

STATE OF TENNESSEE,

Petitioner,

v.

**SOUTHEAST SIGNATURE
MOTORS, INC.**

Respondent.

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No. _____

PETITION

Paul G. Summers, Attorney General and Reporter for the State of Tennessee, (hereinafter “Attorney General”), files this Petition pursuant to Tenn. Code Ann. § 47-18-107 of the Tennessee Consumer Protection Act of 1977, Tenn. Code Ann. § 47-18-101 *et seq.* (hereinafter “the Act”), and would respectfully show the Court as follows:

1. The Attorney General, acting pursuant to the Act, has investigated certain acts and practices of Southeast Signature Motors, Inc., (hereinafter, “Respondent” or “Southeast”). Upon completion of the investigation, the Attorney General has determined that certain acts and practices of the Respondent, more specifically described in paragraph two of this Petition, constitute unfair and deceptive acts or practices affecting the conduct of trade or commerce in the State of Tennessee in violation of the Act. Respondent’s conduct constitutes violations of Tenn. Code Ann. § 47-18-104(a), (b)(2), (b)(3), (b)(5), (b)(7), (b)(11), (b)(12), (b)(14), (b)(17), (b)(22), (b)(23), and (b)(27); and, Tenn. Code Ann. §47-18-1001, *et seq.*, and specifically, §47-18-1003 (1), (2), (4) and (6) of the Tennessee Credit Services Businesses Act of 1988.

2. The Attorney General alleges the following:

- (A) Respondent advertised that it was having an “emergency sell-off”, “mandated sale”, and that “credit rebuilders” would be onsite to assist consumers with rebuilding their credit ratings.
- (B) The terms “emergency sell-off” and “mandated sale” were inaccurate, false, deceptive, misleading, and unfair to consumers. Furthermore, no persons registered or bonded as “credit rebuilders” or a “credit service business” representative under the Tennessee Credit Services Businesses Act of 1988, Tenn. Code Ann. §47-18-1001, *et seq.*, were onsite during the aforementioned sale.

3. Respondent neither admits nor denies the allegations of provisions 2A and 2B.

4. The Attorney General entered into negotiations with Respondent and the parties have agreed to, and the Division has approved, the attached Assurance of Voluntary Compliance.

5. In accordance with the provisions of Tenn. Code Ann. § 47-18-107(c), the execution, delivery and filing of the Assurance does not constitute an admission of prior violation of the Act.

6. The Attorney General and the Respondent, the parties who are primarily interested in the matters set forth in Paragraph two hereof, have jointly agreed to the Assurance of Voluntary Compliance and join in its filing.

PREMISES CONSIDERED, Petitioner prays

1. That this Petition be filed without cost bond pursuant to the provisions of Tenn. Code Ann. §§ 20-13-101 and 47-18-116.

2. That the Assurance of Voluntary Compliance be approved and filed in accordance with the provisions of the Tennessee Consumer Protection Act.

Respectfully submitted,

PAUL G. SUMMERS
Tennessee Attorney General
B.P.R. No. 6285

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